

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____
v. : DATE FILED: _____
CHARLES TOWNSEND : VIOLATIONS:
: 18 U.S.C. § 2113(a)
: (bank robbery - 3 counts)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about October 21, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CHARLES TOWNSEND

knowingly and unlawfully by force and violence, and by intimidation, took, from employees of Wachovia Bank, located at 2904 Island Avenue, lawful currency of the United States, that is, approximately \$427, belonging to, and in the care, custody, control, management, and possession of the Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about January 14, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CHARLES TOWNSEND

knowingly and unlawfully by force and violence, and by intimidation, took, from employees of Beneficial Bank, located at 6401 Woodland Avenue, lawful currency of the United States, that is, approximately \$2,859, belonging to, and in the care, custody, control, management, and possession of the Beneficial Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about February 8, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CHARLES TOWNSEND

knowingly and unlawfully by force and violence, and by intimidation, took, from employees of Sovereign Bank, located at 2701 South 10th Street, lawful currency of the United States, that is, approximately \$406.50, belonging to, and in the care, custody, control, management, and possession of the Sovereign Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).



MICHAEL L. LEVY
United States Attorney